DAVID M. STERN (CA State Bar No. 67697), MICHAEL L. TUCHIN (CA State Bar No. 150375), and KORIN A. AVELINO (CA State Bar No. 260363) KLEE, TUCHIN, BOGDANOFF & STERN LLP 1999 Avenue of the Stars, 39<sup>th</sup> Floor Los Angeles, California 90067

Telephone:

(310) 407-4000

Facsimile:

(310) 407-9090

-and-

SUSAN R. PODOLSKY (VA State Bar No. 27891)

1800 Diagonal Road, Suite 600 Alexandria, Virginia 22314 Telephone: (571) 366-1702

Counsel for Claimant (Claim Nos. 1009, 9681)
PARAMOUNT HOME ENTERTAINMENT INC.

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA (Richmond Division)

In re

Case No.: 08-35653-KRH (Jointly Administered)

CIRCUIT CITY STORES, INC., et al.,

Chapter 11

Debtors.1

#### MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE

1. Pursuant to Local Bankruptcy Rule 2090-1(E)(2), Susan R. Podolsky, a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia, files this motion with the

The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512).

Court for an Order permitting admission for David M. Stern of the law firm Klee, Tuchin, Bogdanoff & Stern LLP to appear and practice *pro hac vice* on behalf of Paramount Home Entertainment Inc. in the above-captioned cases now pending in the United States Bankruptcy Court for the Eastern District of Virginia and any related adversary litigation, the proposed form of which is attached hereto as <a href="Exhibit 1">Exhibit 1</a>. David M. Stern is a member in good standing of the Bar of the State of California; and is admitted to practice before the Supreme Court of California and all other state courts in California, as well as all federal courts in California, and the United States Court of Appeals for the Ninth Circuit. There are no disciplinary proceedings pending against Mr. Stern.

WHEREFORE, Susan R. Podolsky respectfully moves this Court for an Order, substantially in the form attached hereto as <u>Exhibit 1</u>, granting David M. Stern permission to appear and practice *pro hac vice* on behalf of Paramount Home Entertainment Inc. and for such other relief as the Court deems just and appropriate.

By:

Respectfully submitted,

**DATED**: July 16, 2009

SUSAN R) PODOLSKY

Susan R. Podolsky (VA State-Bar No. 27891

1800 Diagonal Road, Suite 600 Alexandria, Virginia 22314 Telephone: (571) 366-1702

Email: susanpodolsky@verizon.net

Local Counsel for PARAMOUNT HOME ENTERTAINMENT INC.

## **CERTIFICATE OF SERVICE**

I, David M. Stern, hereby certify that a true and correct copy of the foregoing *Motion for Admission to Practice Pro Hac Vice* has been served upon the parties listed below via overnight courier on this 16th day of July, 2009.

/s/ David M. Stern
David M. Stern (dstern@ktbslaw.com)

# **U.S. Trustee**

Robert B. Van Arsdale, Esq. Office of the U.S. Trustee 701 East Broad St., Suite 4304 Richmond, VA 23219

# **Counsel to the Debtors**

Gregg M. Galardi, Esq. Ian S. Fredericks, Esq. Skadden, Arps, Slate, Meagher & Flom, LLP One Rodney Square Wilmington, DE 19899

Chris L. Dickerson Skadden, Arps, Slate, Meagher & Flom, LLP 333 West Wacker Drive Chicago, IL 60606

Dion W. Hayes, Esq. Douglas M. Foley, Esq. McGuire Woods LLP One James Center 901 E. Carey St. Richmond, VA 23219

## Counsel to the Official Creditors Committee

Brad R. Godshall, Esq. Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Blvd., Suite 1100 Los Angeles, CA 90067

Lynn L. Tavenner Tavenner & Beran, PLC 20 North Eighth St., 2nd Floor Richmond, VA 23219

# Exhibit 1

DAVID M. STERN (CA State Bar No. 67697), MICHAEL L. TUCHIN (CA State Bar No. 150375), and KORIN A. AVELINO (CA State Bar No. 260363) KLEE, TUCHIN, BOGDANOFF & STERN LLP 1999 Avenue of the Stars, 39th Floor Los Angeles, California 90067 (310) 407-4000 Telephone:

Facsimile:

(310) 407-9090

-and-

SUSAN R. PODOLSKY (VA State Bar No. 27891)

1800 Diagonal Road, Suite 600 Alexandria, Virginia 22314 Telephone: (571) 366-1702

Counsel for Claimant (Claim Nos. 1009, 9681) PARAMOUNT HOME ENTERTAINMENT INC.

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA (Richmond Division)

Case No.: 08-35653-KRH In re (Jointly Administered) CIRCUIT CITY STORES, INC., et al., Chapter 11 Debtors. 1

# ORDER GRANTING ADMISSION PRO HAC VICE

1. Upon the Motion for Admission to Practice Pro Hac Vice (the "Motion"), and the representation by counsel, Susan R. Podolsky, that David M. Stern is a practicing attorney in good standing in the state of California; it is hereby

The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512).

ORDERED that David M. Stern may appear and practice *pro hac vice* in the above-captioned bankruptcy cases and any related adversary litigation on behalf of Paramount Home Entertainment Inc.; and it is further

ORDERED that the Motion is hereby GRANTED.

DATE:	
The state of the s	Kevin R. Huennekens,
	UNITED STATES BANKRUPTCY JUDGE

I ASK EQR THIS:

By:

Susan R. Podolsky (VA State Bar No. 27891)

1800 Diagonal Road, Suite 600 Alexandria, Virginia 22314 Telephone: (571) 366-1702

Email: susanpodolsky@verizon.net

Local Counsel for PARAMOUNT HOME ENTERTAINMENT INC.

# CERTIFICATION OF ENDORSEMENT UNDER LOCAL RULE 9022-1

1. I HEREBY CERTIFY that the foregoing proposed order has been endorsed by or served upon all necessary parties.

Susan R. Podolsky (VA State Bar No. 27891)

# MAILING LIST OF PARTIES TO RECEIVE NOTICE OF ENTRY OF ORDER GRANTING PRO HAC VICE ADMISSION

## U.S. Trustee

Robert B. Van Arsdale, Esq. Office of the U.S. Trustee 701 East Broad St., Suite 4304 Richmond, VA 23219

#### **Counsel to the Debtors**

Gregg M. Galardi, Esq. Ian S. Fredericks, Esq. Skadden, Arps, Slate, Meagher & Flom, LLP One Rodney Square PO Box 636 Wilmington, DE 19899-0636

Chris L. Dickerson Skadden, Arps, Slate, Meagher & Flom, LLP 333 West Wacker Drive Chicago, IL 60606

Dion W. Hayes, Esq. Douglas M. Foley, Esq. McGuire Woods LLP One James Center 901 E. Carey St. Richmond, VA 23219

## **Counsel to the Official Creditors Committee**

Brad R. Godshall, Esq. Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Blvd., Suite 1100 Los Angeles, CA 90067

Lynn L. Tavenner Tavenner & Beran, PLC 20 North Eighth St., 2nd Floor Richmond, VA 23219